FILED
DEC 05 2007
CLERK, U.S. DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA
BY DEPUTY

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

'07 MJ 8964

UNITED STATES OF AMERICA,
Plaintiff,
v.
Jesus Antonio ROMERO-Gonzalez,
Defendant.

Magistrate Case No.:
COMPLAINT FOR VIOLATION OF
21 U.S.C. § 952 and 960
Importation of a Controlled Substance
(Felony)

The undersigned complainant being duly sworn states:

That on or about December 4, 2007, within the Southern District of California, defendant Jesus Antonio ROMERO-Gonzalez, did knowingly and intentionally import approximately 79.24 kilograms (174.33 pounds) of Marijuana, a Schedule I Controlled Substance, into the United States from a place outside thereof, in violation of Title 21, United States Code, Sections 952 and 960.

The complainant states that this complaint is based on the attached Statement of Facts incorporated herein by reference.

Special Agent
Immigration and Customs Enforcement

SWORN TO BEFORE ME AND SUBSCRIBED IN MY PRESENCE, December 5, 2007.

PETER C. LEWIS
U.S. MAGISTRATE JUDGE

)ame

UNITED STATES OF AMERICA
v.
Jesus Antonio ROMERO-Gonzalez

STATEMENT OF FACTS

This complaint is based on the personal observations, investigation, and information furnished to U.S. Immigration and Customs Enforcement Special Agent Lorena Mulvihill.

On December 4, 2007, at approximately 1716 hours, Customs and Border Protection Officer (CBPO) J. Becerra was assigned to primary lanes at the Calexico, California West Port of Entry when a 1991 white Ford Bronco bearing Baja California, Mexico license plate BED9024 approached for entry.

CBPO Becerra encountered the operator and sole occupant of the vehicle, Jesus Antonio ROMERO-Gonzalez. CBPO Becerra received a negative Customs declaration from ROMERO and referred ROMERO and the vehicle to the vehicle secondary lot for further examination.

In the vehicle secondary area CBPO J. Carp assumed responsibility of the vehicle and ROMERO. During CBPO Carp's inspection of the vehicle, CBP Canine Enforcement Officer K. Taylor was conducting a lot sweep with his Human Narcotic Detector Dog (HNDD) and HNDD alerted to the front driver side tire of the vehicle.

During examination of the vehicle, CBPO Carp discovered several packages concealed with in all four tires of the vehicle. CBPO Carp probed a package exposing a green leafy substance, which field-tested positive for marijuana. A total of twenty-eight (28) packages, with a total weight of 79.24 kilograms (174.33 pounds) were removed from the vehicle.

ROMERO was advised of his rights per Miranda. ROMERO stated that he understood his rights and was willing to waive his rights and make a statement. ROMERO admitted knowledge of the narcotics found in the vehicle. ROMERO stated he was to be paid $1400.00 for this smuggling venture.